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VIA EMAIL AND EXPRESS OVERNIGHT MAIL

Sabrina Argentieri, Esquire
Associate Regional Counsel, C-14J
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604

RE: United States Steel Corporation – Granite City Works
Notice and Finding of Violation

Dear Ms. Argentieri:

Pursuant to our telephone conversation on March 8, 2010, and our meeting on January 5, 2010, United States Steel Corporation (U. S. Steel) is responding to the Notice and Finding of Violations (NOV) issued to U. S. Steel Granite City Works, dated September 30, 2009. As you know, U. S. Steel and the United States Environmental Protection Agency (EPA) decided that it would be best to consolidate a meeting on this issue along with issues requiring resolution regarding U. S. Steel's Great Lakes Works and Gary Works. Therefore, a consolidated meeting was held on January 5, 2010 in Merrillville, Indiana at Indiana Department of Environmental Management (IDEM) offices to discuss resolution of this and other matters. To facilitate an easier review of our responses, we have provided the numbered paragraph from the NOV along with the corresponding allegation, as provided in the NOV, followed by our response. While U. S. Steel respectfully disagrees with many of the allegations raised in the NOV, U. S. Steel appreciates the opportunity to provide this response and would be pleased to address any questions that the United States Environmental Protection Agency (USEPA) may have after it reviews the response.

RESPONSES TO ALLEGATIONS PROVIDED IN FINDING OF VIOLATION/NOTICE OF VIOLATION

PARAGRAPH NO. 53
USEPA ALLEGATION

U.S. Steel violated and continues to violate Section 165 of the Act, 42 U.S.C, §7475, Section 173 of the Act, 42 U.S.C. § 7503,40 C.F.R. § 52.21, and 35 IAC 203 by constructing a major modification in 1994 to Blast Furnace B at the U.S. Steel facility without applying for or obtaining the PSD/NA NSR permits and operating the modified source without applying BACT/LAER or going through PSD/NA NSR review, and installing appropriate emission control equipment in accordance with a BACT/LAER analyses.

U. S. STEEL RESPONSE:

As we previously discussed, U. S. Steel has great concerns about the scope of U. S. EPA's request for information regarding a time period dating back almost 29 years when U. S. Steel acquired certain assets only, including portions of the former Granite City Works of National Steel Corporation, to which the Requests pertain, from the bankrupt estate of National Steel Corporation, by conveyance on May 20, 2003. As previously noted in our responses to the § 114 Requests, U. S. Steel had great difficulty in obtaining the requested National Steel information.

U. S. Steel is also troubled by U. S. EPA's apparent insistence that U. S. Steel is somehow liable for any violations incurred by National Steel.

First, in the above referenced alleged violation, U. S. EPA has made a broad assertion that "U. S. Steel" *has violated and continues to violate* the Clean Air Act by constructing a major modification in 1994 to Blast Furnace B at the U.S. Steel facility without applying for or obtaining the PSD/NA NSR permits and operating the modified source without applying BACT/LAER or going through PSD/NA NSR review, and installing appropriate emission control equipment in accordance with a BACT/LAER analyses. U. S. Steel would like to clarify that regardless of any alleged activities conducted by National Steel Corporation, U. S. Steel did not "construct a major modification in 1994 to Blast Furnace B" because, among other reasons, U. S. Steel did not own or operate Blast Furnace B in 1994, and U. S. Steel is not a successor to National Steel by terms of the Bankruptcy Order (Case Nos. 02-08697 through 02-08738). By the terms of the Order, U. S. Steel acquired only certain assets of National Steel Corporation. U. S. Steel was not the owner of such assets of Granite City Works prior to May 20, 2003; and by the terms of the Bankruptcy Order, any and all liabilities, including those pertaining to the operation of the Granite City Works prior to May 20, 2003, have been discharged by United States Bankruptcy Court for the Northern District of Illinois, Eastern District. Furthermore, as we discussed, U. S. Steel is concerned with U. S. EPA's reliance on such information because U. S. Steel is not able to verify the accuracy or completeness of any such potentially responsive information and it certainly is not responsible for any alleged violations or failures as a result of any act of National Steel Corporation.

Second, U. S. Steel cannot fully technically respond to the NOV for several reasons, including, but not limited to the fact that U. S. EPA has not substantiated the claim with sufficient details such as the information it used as to what production data were used; what criteria pollutant emissions incurred a significant net emissions increase along with any supporting netting calculations that would include contemporaneous emission changes; and how U. S. EPA attributed any apparent or alleged emissions increase to the 1994 project, etc. Without such additional information being provided by U. S. EPA, U. S. Steel cannot provide any technical response that would either support or deny U. S. EPA's allegations. Furthermore, because U. S. Steel did not perform the reline on B Blast Furnace in 1994, we are unable to determine if or verify that the scope of the project actually implemented was consistent with the National Steel documentation provided to U. S. EPA in response to the § 114. In short, because the allegation lacks specificity, we are unable to provide substantive, technical comments to U. S. EPA's allegations.

Third, as noted in the documents provided to U.S. EPA in response to the § 114

Requests, the permit history of the blast furnace in question is quite long and cumbersome. U. S. Steel's review of the National Steel documents and permitting history indicates that National Steel frequently requested and was issued production increase permits throughout the years under National Steel ownership. In such permit revisions, National Steel and Illinois EPA, at times, clarified that such production increases were not "modifications;" i.e., the increases in production that were authorized in such permits was not attributable to physical change or change in operation at the blast furnace. U. S. Steel is unclear how U. S. EPA distinguished any alleged increases in production to the reline project from production that the furnace was capable of accommodating prior to the reline. In addition, U. S. Steel is not clear how any alleged increases in emissions from any said increase in production resulted in a significant net emissions increase when considering any contemporaneous emission increases and decreases. Furthermore, U. S. Steel notes that Granite City Works is multiple furnace operation. Since the demand for steel fluctuates and is very elastic, reviewing production data is not necessarily representative of an individual furnace's production capacity or what production rate a furnace can accommodate. Specifically, the production of one furnace is not only dependent upon the market demand for steel, but is also dependent upon operations and availability of the other furnaces at the facility or owned by the same owner.

Fourth, U. S. Steel notes that several courts in the Seventh Circuit, including the Seventh Circuit Court of Appeals, have clearly indicated that a PSD violation is a discrete event that occurs at the time the alleged construction or modification begins, and all claims for civil penalties must be brought within five years of the claim's accrual. See, *e.g., United States v. Midwest Generation*, 2010 WL 889986 (N. D. Ill.) and Sierra *Club v. Franklin County Power of Ill, LLC*, 546 F.3d 918, 928 (7th Cir. 2008). In addition, courts in the Seventh Circuit have distinguished between violations of preconstruction permit requirements and operation permit requirements. For example, in *United States v. Illinois Power Co.*, 245 F.Supp.2d 951 (S.D.Ill. 2003), the court concluded that a PSD violation is a discrete violation and do not create liability for operation after construction. The court explained that the requirement that "best available control technology" be employed is tied into the construction permit phase and does not stand alone later in the operation permit phase.

Fifth, U. S. Steel questions U. S. EPA's interpretation of the Clean Air Act and the above-referenced Bankruptcy Order regarding any claims for injunctive relief. Assuming *arguendo* that National Steel did violate the PSD provisions in 1994 as USEPA alleges, which, from what U. S. Steel can tell, it did not, U. S. EPA has made the claim that it is entitled to injunctive relief for such alleged violation but U. S. EPA has never indicated what that relief would entail. U. S. Steel respectfully disagrees with U. S. EPA' interpretation since the Bankruptcy Order clearly limits and governmental claims to those authorized under its police authority. U. S. Steel maintains that injunctive relief in this instance is beyond U. S. EPA's limited police authority authorized by the Bankruptcy Order since the B Blast Furnace has been in operation for approximately sixteen years since the alleged violation would have occurred; and the emissions from the furnace have been considered, included and authorized in Illinois' State Implementation Plan and its revisions since 1994. In addition, even if U. S. Steel was not afforded any protection from the Bankruptcy Order, which it is, courts within the Seventh Circuit have established a precedent in similar cases that U. S. EPA would not be entitled to injunctive relief. *See e.g., United States v. Midwest Generation.* Applying the *Midwest Generation* court's analysis to this instance, U. S. EPA would not be entitled to any injunctive relief unless it

can establish that U. S. Steel owned or operated B Blast Furnace at the time the alleged violation occurred. Since U. S. Steel did not, under such an analysis, U. S. Steel would not be liable for any alleged violation incurred by National Steel, regardless of the bankruptcy protection.

Finally, U. S. Steel questions U. S. EPA's allegations for the reasons expressed above especially when considered with the fact that National Steel did apply for and obtain a PSD permit to allow increased iron production. This production increase permit authorized increased production based upon National Steel's modeling data, BACT analysis, etc. For this reason, it would appear that any right to injunctive relief would have been satisfied by the permit and application materials submitted to Illinois EPA to support the permit.

While U. S. Steel is open to discuss U. S. EPA's allegations in more detail and we are hopeful that the issues identified in the NOV can be resolved without litigation, U. S. Steel does not anticipate accepting liability for any violations that were alleged to have been incurred by National Steel Corporation.

PARAGRAPH NO. 54
USEPA ALLEGATION:

U.S. Steel self-reported in its Semi-Annual Compliance Reports to IEPA the following exceedances at its blast furnace casthouse roof monitor:

Date	Time
04/02/2007	11:31-11:37
10/17/2007	11:25-11:31
10/30/2007	10:16-10:22
10/30/2007	10:22-10:28
10/30/2007	10:28-10:34
01/16/2008	09:33-09:39
06/17/2008	09:08-09:14

Visible emissions exceeding twenty percent (20%) opacity on a six-minute average from blast furnace casthouse roof monitors are violations of 40 C.F.R. Part 63, Subpart FFFFF.

U. S. STEEL RESPONSE:

U. S. Steel has reviewed the Semi-Annual Compliance Reports and operating records and has determined that the excursions identified above are not systemic, are not maintenance related; nor could they have been foreseen. Nonetheless, because U. S. Steel's goal is to achieve 100%, it has implemented corrective actions that are responsive to the excursions to prevent the reoccurrence of such incidents. See, especially, corrective actions noted below. U. S. Steel notes that it has not incurred any such exceedances since June 17, 2008. U. S. Steel also notes that three of the above seven readings occurred during a consecutive 18-minute period are the result of the same incident and root cause. Each of the incidents is described below:

April 2, 2007 – The blast furnace casthouse opacity was 21.9% 6-minute average. The elevated emissions were attributed to the cast drying prior to the taphole being

closed. U. S. Steel incurred unusually high blast pressure during casting. The excessive gas pressure caused the furnace to cast with tremendous force which overwhelmed the emission evacuation system by traveling up the furnace shell and exiting the casthouse roof.

October 17, 2007 - The furnace wind rate was unexpectedly reduced suddenly because of a loss of blast pressure from the No. 2 Powerhouse. The blast pressure reduction forced the furnace to shutdown, at the end of the cast, and at the low wind rate, the resultant emissions from the taphole at the end of the cast overwhelmed the emission evacuation system by traveling up the furnace shell and exiting the casthouse roof.

October 30, 2007 - These reported excessive emissions were shutdown related. The furnace was shutdown because Granite City Works incurred a mechanical problem with the mudgun. The mudgun failed to properly latch to the blast furnace. The resultant emissions from the taphole overwhelmed the emission evacuation system by traveling up the furnace shell and exiting the casthouse roof.

January 16, 2008 – The furnace was casting erratically and emissions from the taphole were unexpectedly more forceful than anticipated and the result emissions from the taphole overwhelmed the emission evacuation system.

June 17, 2008 – The blast pressure forced emissions to evolve from the taphole with tremendous force because of a failure to stop the cast with the mudgun at the appropriate time. (Mud inadvertently fell into the trough which caused the delay in closing the taphole.) Excessive emissions were generated from the taphole and taphole clay burning due to contact with the molten iron.

Corrective Actions Employed During the Fall 2008 Outage: Engineering was consulted to determine if engineering improvements could be made to allow the emission evacuation system to better capture emissions during low wind rates. Engineering indicated that shielding under the walkway above the taphole area of B Furnace could be installed to force emissions back into the hood collection system to prevent or minimize such emissions from traveling up the furnace shell and escaping through the casthouse roof. U. S. Steel implemented such shielding improvements during the Fall 2008 outage – approximately one year prior to being issued the Notice of Violation from U. S. EPA. Operators and engineers have noted improved performance in this area ever since the furnace started up during the summer of 2009. In sum, the corrective actions that U. S. Steel has implemented since incurring these deviations have been effective, since no such incidents have been observed since the changes were implemented.

PARAGRAPH NO. 55
USEPA ALLEGATION:

U. S. Steel self-reported in its Semi-Annual Compliance Reports to IEPA the following monitoring results for its BOPF Shop roof monitor:

Date	Time
05/23/2006	10:15-10:18
05/23/2006	10:34-10:37
06/19/2006	11:14-11:17
07/25/2006	12:04-12:07

07/28/2006	13:07-13:10
08/11/2006	11:43-11:46
10/24/2006	11:57-12:00
10/24/2006	12:00-12:03
11/13/2006	13:45-13:48
01/29/2007	12:12-12:15
01/29/2007	12:15-12:18
02/07/2007	13:31-13:34
02/07/2007	13:34-13:37
02/07/2007	13:37-13:40
03/20/2007	10:27-10:30
03/20/2007	10:30-10:33
04/05/2007	08:27 - 08:30
04/10/2007	09:21-09:24
04/12/2007	08:20-08:23
04/12/2007	08:29-08:32
04/13/2007	08:35-08:38
04/13/2007	08:38™ 08:41
04/13/2007	09:09-09:12
04/16/2007	08:29-08:32
04/18/2007	08:56-08:59
04/24/2007	14:26-14:29
04/24/2007	14:29-14:32
04/24/2007	14:32-14:35
04/24/2007	15:29-15:32
04/24/2007	15:32-15:35
04/24/2007	15:35-15:38
04/24/2007	16:30-16:33
04/24/2007	16:33-16:36
04/24/2007	16:36-16:39
04/25/2007	12:45-12:48
05/10/2007	14:08-14:11
05/21/2007	15:23 - 15:26
07/04/2007	06:25-06:28
07/25/2007	13:29-13:32
07/25/2007	13:32-13:35
07/25/2007	13:35-13:38
08/15/2007	12:14-12:17
08/30/2007	12:39-12:42
10/25/2007	13:27-13:30
12/21/2007	13:50-13:53
12/26/2007	13:05-13:08
01/18/2008	09:33-09:36
01/23/2008	08:39-08:42
01/30/2008	15:24-15:27
01/30/2008	15:49-15:52

02/08/2008	08:22-08:25
02/08/2008	12:54-12:57
02/08/2008	12:57-13:00
03/26/2008	13:28-13:31
08/29/2008	08:12-08:15
10/01/2008	13:07-13:10

Visible emission from the BOPF Shop roof monitor exceeding twenty percent (20%) opacity on a three-minute average is a violation of 40 C.F.R. Part 63, Subpart FFFFF.

U. S. STEEL RESPONSE:

These alleged violations have been and are currently being diligently prosecuted by the Illinois Attorney General along with the Illinois EPA and are subject to an existing Consent Order. A copy of the Order, and the Agreed Modification, is provided behind Tab 55. As noted in the Order, U. S. Steel was obligated to, *inter alia*, pay a civil penalty, complete an engineering study, and submit a compliance schedule in which improvements to the BOPF Shop could be made. U. S. Steel previously paid the civil penalty on or about January 10, 2008. Also, as noted in the Agreed Order, U. S. Steel has already completed an engineering study, shared the results of the study with the Illinois EPA and the Illinois Attorney General, revised the Compliance Plan and Schedule that reflect the results of the Study, completed repairs and replacements for the Hood and ESP ductwork; and is currently in the process of making repairs to the ESPs, noting that repairs to the #1 ESP Section A were previously completed. U. S. Steel would also like to clarify that many of the above-referenced exceedances were the result of investigations conducted during the engineering study to determine cause and effect of various activities and resulting emissions at the BOPF Shop.

U. S. Steel notes, specifically, that the Consent Order with the Illinois Attorney General requires U. S. Steel to certify compliance at the BOP no later than March 31, 2011. U. S. Steel also notes that the Consent Order with the Illinois Attorney General requires U. S. Steel to "cease and desist from future violations of the Act and state and federal regulations that were the subject matter of the complaint, except that, for those violations covered by compliance schedules set forth in III.D.2., 3, and 4, *implementation of the cease and desist requirement shall be consistent with the compliance schedule.*" U. S. Steel notes that paragraph II.D.3 pertains to the Compliance Schedule for the Basic Oxygen Furnace. The Illinois Attorney General, Illinois EPA, and U. S. Steel agreed to the Compliance Schedule presented in the Agreed Modification. Because the matter along with the above-referenced alleged violations have been diligently prosecuted by the Illinois Attorney General, U. S. Steel respectfully questions the appropriateness of U. S. EPA's overfiling of the Illinois Attorney General's action, especially since the Illinois EPA is delegated authority by U. S. EPA to enforce the National Emission Standards to which U. S. EPA references, and U. S. Steel has satisfied a significant civil penalty. U. S. Steel also questions U. S. EPA's overfiling of the matter, especially at this stage, notably, as U. S. Steel has already expended significant capital and continues to expend great amounts at the BOPF Shop to make the improvements to which the parties agreed were appropriate. Finally, U. S. Steel notes that significant improvements at the BOP have been made and continue to be made as a result of the projects implemented by U. S. Steel as a result of the agreement reached among U. S. Steel, the Illinois Attorney General and the Illinois EPA.

PARAGRAPH NO. 56
USEPA ALLEGATION:

During the period between July 1, 2006, and December 31, 2006, U.S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse - daily compressed air and quarterly physical integrity; Casthouse Baghouse - daily compressed air and quarterly physical integrity; Reladle/Desulurization Baghouse - monthly bag tension inspection and quarterly physical integrity; Slag Skimmer Baghouse - monthly cleaning mechanisms and quarterly physical integrity; Ladle Metallurgy Furnace Baghouse - monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

U. S. Steel would like to clarify that the above-referenced alleged violation appears to be a quick summary of alleged missed MACT inspections, but it does not accurately depict the fact that the majority of the required inspections were completed and documented; however, U. S. Steel was (and remains) unable to provide documentation that every required inspection was completed during the referenced time period. For example, U. S. Steel has documentation verifying that iron spout baghouse inspections occurred on 164 days out of the referenced 180 days, i.e., U. S. Steel is unable to produce documentation indicating that the inspections occurred on 20 of the 184 days in which inspections were required, as opposed to not having documentation to verify that *any* daily iron spout baghouse inspections were completed during the above-referenced time period. Similarly, U. S. Steel completed 158 daily casthouse baghouse inspections during this time period. Representative examples of documents indicating that inspections occurred during this time period are provided behind Tab 56. Because of the volume of inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets. Additional supporting documentation regarding the inspections during this time period can be provided to U. S. EPA upon request.

In any case, the fact that U. S. Steel completed many or most of the required inspections should not be interpreted to mean that U. S. Steel does not take every single inspection and resulting documentation seriously. Unfortunately, U. S. Steel is unable to verify that the operators completed the required MACT inspections for every inspection and reporting obligation, but it does take the MACT inspection program seriously which is evidenced by its general compliance with and commitment to the MACT inspection program. U. S. Steel has reviewed its inspection program and records and has determined that the inspection exceptions identified above are no longer systemic. Nonetheless, because U. S. Steel's goal is to achieve 100% compliance, it has recently implemented corrective actions to ensure that the required inspections are completed. In addition, U. S. Steel retrained its operators to ensure that the operators are aware of the 100% compliance requirement. The retraining program included training on U. S. Steel Granite City Works' new electronic Environmental Management System (EMS) that has been implemented since the deviations were reported. The electronic EMS program is now an integral part of Granite City Works. The electronic system requires operators to complete inspection checklists that are available for review by Environmental Control. Furthermore, if an inspection due date is approaching, operators and Environmental Control are alerted to ensure that the due date is approaching so appropriate action can be taken.

To implement the EMS, U. S. Steel Granite City Works is utilizing a software package that tracks inspections associated with the MACT standards. This tracking also includes the tracking of certain permit requirements. The software allows for the tracking of task completion and notifies personnel and supervisors when inspections are not completed on time. The notifications are scheduled to notify supervisors prior to the regulatory due date.

The following is a process flow of an inspection in the software:

- Tasks are entered and a schedule is identified (weekly, monthly, etc.)
- Due dates in the system are in the middle of the regulatory frequency.
- Days before the due date an email is sent to those who need to complete the inspections.
- If the inspection is not completed by the due date, additional emails are sent to the original group and to additional personnel.
- If the inspection is still not complete days after the due date but prior to the regulatory due date, additional emails are sent to the previous groups and to supervisors.
- If the inspection is still not completed, an additional email goes to the Division Manager (still prior to the end of the regulatory due date).

Once the inspection is complete, the completion date and any findings are entered into the system. If the inspection reveals any questionable, the U. S. Steel Granite City Works inspector will identify that follow-up is required. The system will then send an email to those identified stating that follow-up is required.

U. S. Steel continues to investigate ways it can improve and enhance its inspection procedures that could minimize such deviations. We continue to review and compare inspection procedures at other U. S. Steel facilities. U. S. Steel will adopt any additional inspection enhancements gained from this company-wide review at Granite City Works, if feasible and appropriate.

PARAGRAPH NO. 57
USEPA ALLEGATION:

During the period between January 1, 2007, and June 30, 2007, U. S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse - quarterly physical integrity; Casthouse Baghouse - quarterly physical integrity; Reladle/Desulurization Baghouse - monthly bag tension inspection and quarterly physical integrity; Slag Skimmer Baghouse - monthly cleaning mechanism and quarterly physical integrity; Ladle Metallurgy Furnace Baghouse - monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(l),

U. S. STEEL RESPONSE:

U. S. Steel would like to clarify that its electronic reporting system indicates that all of the above-referenced inspections were complete, but hard copies of some of the required inspection reports could not be located, except to note that we have located monthly slag skimmer baghouse cleaning mechanism and monthly LMF baghouse cleaning mechanism inspection reports for the above-referenced time period. Because of the volume of inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets (February 2007 for Slag Skimmer

Baghouse Cleaning Mechanism and January 2007 for LMF baghouse cleaning mechanism) behind Tab 57. Additional supporting documentation regarding the monthly inspections at the Slag Skimmer baghouse cleaning mechanism and LMF baghouse cleaning mechanism during this time period can be provided to U. S. EPA upon request.

By way of further response, U. S. Steel refers U. S. EPA to our response provided to EPA allegations raised in Paragraph 56, as presented above.

PARAGRAPH NO. 58
USEPA ALLEGATION:

During the period between July 1, 2007, and December 31, 2007, U. S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse - quarterly physical integrity; Casthouse Baghouse - quarterly physical integrity; Reladle/Desulurization Baghouse - monthly bag tension inspection and quarterly physical integrity; Slag Skimmer Baghouse - quarterly physical integrity; Ladle Metallurgy Furnace Baghouse - monthly cleaning mechanism in violation of 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Similar to our response above, U. S. Steel would like to clarify that its electronic reporting system indicates that all but two of the above-referenced inspections were completed (the electronic system does not indicate whether or not two of the monthly LMF Baghouse Cleaning Mechanism inspections were completed), but hard copies of some of the required inspection reports could not be located, except to note that we have located monthly slag skimmer baghouse cleaning mechanism and monthly LMF baghouse cleaning mechanism inspection reports (all but two) for the above-referenced time period. Because of the volume of inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets (December 2007 for Slag Skimmer Baghouse Cleaning Mechanism and July 2007 for LMF baghouse cleaning mechanism) behind Tab 58. Additional supporting documentation regarding the monthly inspections at the Slag Skimmer baghouse cleaning mechanism and LMF baghouse cleaning mechanism during this time period can be provided to U. S. EPA upon request.

By way of further response, U. S. Steel refers U. S. EPA to our response provided to EPA allegations raised in Paragraph 56, as presented above.

PARAGRAPH NO. 59
USEPA ALLEGATION:

During the period between January 1, 2008, and June 30, 2008, U. S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse - quarterly physical integrity and daily inspections; Casthouse Baghouse - quarterly physical integrity and daily inspections; Reladle/Desulurization Baghouse - quarterly physical integrity; Slag Skimmer Baghouse - quarterly physical integrity; Ladle Metallurgy Furnace Baghouse - monthly cleaning mechanism and quarterly physical integrity in violation of 40 C.F.R. §63.7834(a)(l).

U. S. STEEL RESPONSE:

U. S. Steel would like to clarify that the above-referenced alleged violation appears to be a quick summary of alleged missed MACT inspections, but it does not accurately depict the fact that the majority of the required inspections were completed and documented; however, U.

S. Steel was (and remains) unable to provide documentation that every required inspection was completed during the referenced time period. For example, U. S. Steel has documentation verifying that daily iron spout baghouse inspections occurred on 178 days out of the referenced 182 days, i.e., U. S. Steel is unable to produce documentation indicating that the inspections occurred on 4 of the 182 days in which inspections were required, as opposed to not having documentation to verify that *any* daily iron spout baghouse inspections were completed during the above-referenced time period. Similarly, U. S. Steel has documentation that it completed 177 daily casthouse baghouse inspections during this time period and is unable to produce documentation verifying that such inspections occurred on 5 of the 182 days in the period. Representative examples of documents indicating that inspections occurred during this time period are provided behind Tab 59. Because of the volume of inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets. Additional supporting documentation regarding the inspections during this time period can be provided to U. S. EPA upon request.

Also, similar to our responses above, U. S. Steel would like to clarify that its electronic reporting system indicates that the above-referenced monthly and quarterly inspections were completed as required, except the electronic system does not indicate whether or not two of the monthly LMF Baghouse Cleaning Mechanism inspections were completed. However, hard copies of some of the required inspection reports could not be located, except to note that we have located monthly slag skimmer baghouse cleaning mechanism and monthly LMF baghouse cleaning mechanism inspection reports (all but two) for the above-referenced time period. Because of the volume of inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets (December 2007 for Slag Skimmer Baghouse Cleaning Mechanism and July 2007 for LMF baghouse cleaning mechanism) behind Tab 59. Additional supporting documentation regarding the monthly inspections at the Slag Skimmer baghouse cleaning mechanism and LMF baghouse cleaning mechanism during this time period can be provided to U. S. EPA upon request.

U. S. Steel notes that on January 29, 2009, Illinois EPA issued a Violation Notice (A-2008-00223) regarding the same allegations identified above. U. S. Steel responded to the Violation Notice on March 18, 2010; met with Illinois EPA on April 8, 2009 regarding the Notice, and provided supplemental responses on April 29, 2009 and March 19, 2010, verifying that U. S. Steel EMS was fully implemented with all of the monthly and quarterly inspection requirements being incorporated into the EMS. In the March 19, 2010 correspondence, U. S. Steel also advised Illinois EPA that affected employees have all been trained on the proper utilization and maintenance of the EMS and receive email reminders.

By way of further response, U. S. Steel refers U. S. EPA to our response provided to EPA allegations raised in Paragraph 56, as presented above

PARAGRAPH NO. 60
USEPA ALLEGATION:

During the period between July 1, 2008, and December 31, 2008, U. S. Steel failed to inspect the following equipment and processes: Iron Spout Baghouse - daily compressed air inspections and quarterly physical integrity; Casthouse Baghouse - daily compressed air inspections and quarterly physical integrity; Ladle Metallurgy Furnace Baghouse - monthly cleaning mechanism in violation of 40 C.F.R, § 63.7834(a)(l).

U. S. STEEL RESPONSE:

U. S. Steel would like to clarify that the above-referenced alleged violation appears to be a quick summary of alleged missed MACT inspections, but it does not accurately depict the fact that the majority of the required inspections were completed and documented; however, U. S. Steel was (and remains) unable to provide documentation that every required inspection was completed during the referenced time period. First, it is significant to note that the facility was idled for 19 of the 182 days during the referenced time period, i.e., the plant was in operation only 163 days during this period. U. S. Steel has documentation verifying that daily iron spout baghouse inspections occurred on 159 days out of the referenced 163 days, i.e., U. S. Steel is unable to produce documentation indicating that the inspections occurred on 4 of the 163 days in which inspections were required when the facility was in operation, as opposed to not having documentation to verify that *any* daily iron spout baghouse inspections were completed during the above-referenced time period. Similarly, U. S. Steel has documentation that it completed 162 daily casthouse baghouse inspections during this time period and is unable to produce documentation verifying that such inspections occurred on 1of the 163 days in the period. Representative examples of documents indicating that daily inspections occurred during this time period are provided behind Tab 60. Because of the volume of inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets. Additional supporting documentation regarding the inspections during this time period can be provided to U. S. EPA upon request.

Also, similar to our responses above, U. S. Steel would like to clarify that its electronic reporting system indicates that the above-referenced monthly and quarterly inspections were completed as required, except the electronic system does not indicate whether or not one of the quarterly iron spout baghouse physical integrity, one of the quarterly casthouse baghouse physical integrity, and one of the monthly LMF baghouse inspections were completed, i.e., U. S. Steel has documentation verifying that one of the required two quarterly iron spout baghouse physical integrity, one of the two casthouse physical integrity, and five of the six monthly LMF baghouse cleaning mechanism inspections were completed. Because of the volume of quarterly and monthly inspection sheets completed during the above-referenced time period, U. S. Steel is only providing a sample of responsive completed inspection sheets behind Tab 60. Additional supporting documentation regarding the quarterly and monthly inspections can be provided to U. S. EPA upon request.

By way of further response, U. S. Steel refers U. S. EPA to our response provided to EPA allegations raised in Paragraph 56, as presented above

PARAGRAPH NO. 61
USEPA ALLEGATION:

From January 1, 2006, to June 30, 2006, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp and damper position requirements of its written operation and maintenance plan for a period of 2 hours and 5 minutes in violation of 40 C.F.R. § 63.7834(a)(i).

U. S. STEEL RESPONSE:

Of the referenced 2 hours and 5 minutes, U. S. Steel was casting 1 hour and 27 minutes. U. S. Steel reported these malfunctions to Illinois EPA as required.

Date	Time	Reported Duration (min)	Reason	Casting Duration (min)
5/27/2006	2:40 pm - 3:10 pm	30	compressor failure	30
5/28/2006	2:00 am - 2:15 am	15	high inlet temperature	15
5/31/2006	1:15 am - 1:20 am	5	high inlet temperature	5
5/31/2006	2:37 am - 2:47 am	10	high differential pressure	10
5/31/2006	4:55 am - 5:00 am	5	high differential pressure	5
6/16/2006	3:30 am - 4:15 am	45	compressor failure	17
6/20/2006	2:45 pm - 3:00 pm	15	high inlet temperature	5

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 61.

Since incurring the deviations, U. S. Steel has implemented significant corrective actions. First, a continuous improvement team was formed to improve the operational performance and reliability of the baghouses. To date the team has implemented improvements to the automation control logic that has improved the cleaning cycles, allowed greater flexibility to perform maintenance activities, and set-up an early warning alarm system to detect immediately when a problem begins. The team has also implemented a retraining program for the operator and maintenance focused on best baghouse practices. The team is also continuing to develop and implement improvements to the compressed air system used to clean (pulse) the bags. All of these projects are focused on improving the reliability of the baghouse and eliminate any potential deviations. Second, Granite City Works initially established the damper positions (as incorporated in prior versions of the O&M Plan) based on the initial stack test completed in 2006. In 2009, Granite City Works evaluated historical damper positions in conjunction with Method 9 observations and determined the damper position limits could be changed without impacting the capture of emissions in the Casthouse. The Operation and Maintenance Plan was then modified to reflect these changes. This is consistent with the final Iron and Steel MACT rule, as promulgated in the May 20, 2003, *Federal Register* (68 FR 27646) where U. S. EPA concurred with commenters that commented that an enforceable range of operating limits applicable under all operating conditions cannot be determined from the performance test for damper systems. U. S. EPA recognized that fixed damper positions for one set of operating conditions are not appropriate for all operating conditions due to varying simultaneous operations, normal process variations, and seasonal variations. U. S. EPA allows sources to operate under multiple scenarios. While U. S. Steel concedes that, at the time the deviations were reported, the Operations and Maintenance Plan (O&M Plan) did not identify all of the scenarios in which we operated (hence the occurrence and reporting of the deviations), the deviations are really attributable to the O&M Plan not being updated to be consistent with the operating scenarios than they are to any environmental or operational concern since U. S. Steel has subsequently shown it can operate under the different scenarios while complying the MACT and applicable state regulations.

In sum, since implementing these corrective actions, U. S. Steel has realized marked improvements as evidenced in its more recent compliance history and compliance reports. U. S. Steel continues to investigate ways it can reduce and minimize deviations.

PARAGRAPH NO. 62
USEPA ALLEGATION:

From July 1, 2006 to December 31, 2006, U. S. Steel failed to comply with the Iron Spout Baghouse fan amp and damper position requirements of its written operation and maintenance plan for a period of 58 hours and 11 minutes in violation of 40 C.F.R. §63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 58 hours and 11 minutes reported, U. S. Steel was casting 54 hours and 52 minutes, of which 18 hours and 7 minutes of the time for deviations while casting were attributable to malfunctions as reported to the Illinois EPA. U. S. Steel reported these malfunctions to Illinois EPA as required.

Date	Time	Reported Duration (min)	Reason	Casting Duration (min)
7/2/2006	3:02 pm - 3:18 pm	16	both fans down due to high inlet temp	16
7/4/2006	4:55 pm - 5:25 pm	30	both fans down due to high inlet temp	30
7/10/2006	10:13 am - 10:30 am	17	both fans down due to high differential pressure	10
7/10/2006	10:30 am - 11:52 am	82	one fan down due to problems restarting	52
7/10/2006	7:02 pm - 7:11 pm	9	both fans down due to high inlet temp	8
7/10/2006	11:19 pm - 11:26 pm	7	both fans down due to high inlet temp	7
7/19/2006	12:36 am - 12:43 am	7	both fans down due to high inlet temp	7
7/19/2006	3:52 am - 4:00 am	8	both fans down due to high inlet temp	8
7/19/2006	6:53 am - 7:01 am	8	both fans down due to high inlet temp on compressors	8
7/20/2006	2:36 am - 2:59 am	23	both fans down due to air compressor failing	23
7/20/2006	8:47 am - 9:29 am	42	both fans down due to air compressor failing	28
7/20/2006	10:42 am - 10:58 am	16	both fans down due to air compressor failing	16
7/20/2006	12:30 pm - 2:05 pm	95	both fans down due to air compressor failing	65
7/20/2006	6:24 pm - 6:38 pm	14	both fans down	14
7/20/2006	6:38 pm - 6:45 pm	7	one fan down	7
7/20/2006	7:58 pm - 9:35 pm	87	both fans down	58
7/20/2006	9:35 pm - 10:42 pm	67	one fan down	38
7/20/2006	10:42 pm - 11:59 pm	77	both fans down due to electrical problems	32
7/21/2006	12:00 am - 1:53 am	113	both fans down	87
7/21/2006	1:53 am - 6:05 am	252	one fan down	192
7/21/2006	6:05 am -7:05 am	60	both fans down	25
7/21/2006	7:05 am - 7:47 am	42	one fan down due to electrical problems	42
7/22/2006	1:56 pm - 2:50 pm	54	both fans down	20
7/22/2006	2:50 pm - 5:13 pm	143	one fan down due to high differential pressure	48
7/28/2006	12:34 pm - 12:42 pm	8	both fans down due to high inlet temp on compressors	8

8/3/2006	9:40 am - 9:47 am	7	both fans down due to a bad fuse on a controller	7
8/6/2006	3:26 pm - 3:32 pm	6	both fans down due to a module skipped cleaning alarm	6
8/14/2006	12:41 pm - 12:50 pm	9	both fans down due to high inlet temp	9
9/7/2006	11:43 am - 11:51 am	8	one fan down while maintenance performed a check on louvers	1
9/7/2006	11:58 am - 12:06 pm	8	one fan down while maintenance performed a check on louvers	8
9/9/2006	4:10 pm - 4:30 pm	20	both fans down due to high differential pressure and loss of air pressure	0
9/9/2006	4:55 pm - 5:25 pm	30	both fans down due to #1 module having a bad poppet and loss of air pressure	30
9/10/2006	2:00 am - 2:15 am	15	both fans down due to high differential pressure	15
9/10/2006	2:35 am - 3:35 am	60	both fans down due to disconnected air line laterals and bad poppets	39
9/12/2006	2:44 pm - 3:07 pm	23	both fan s down due to a blown fuse on #4 damper	23
9/13/2006	6:06 pm - 6:39 pm	33	both fans down due to high inlet temp	26
9/14/2006	12:50 pm -1:00 pm	10	both fans down due to high inlet temp	10
9/14/2006	9:55 pm - 10:15 pm	20	both fans down due to high inlet temp	20
9/15/2006	1:55 am - 2:03 am	8	both fans down due to high inlet temp	8
9/15/2006	6:10 am - 6:20 am	10	both fans down due to high inlet temp	10
9/15/2006	9:50 am - 10:01 am	11	both fans down due to high differential pressure	11
9/17/2006	2:30 pm - 2:45 pm	15	both fans down due to high differential pressure	15
10/8/2006	12:00 pm - 1:59 pm	119	#1 and #2 fans fan amps below hourly limit	119
10/23/2006	9:00 am - 1:59 pm	299	#1 and #2 fans fan amps below hourly limit	299
10/30/2006	5:00 pm - 6:59 pm	119	#1 and #2 fans fan amps below hourly limit	119
11/16/2006	9:00 am - 12:59 pm	239	#1 fan amps below hourly limit	239
11/16/2006	10:00 am - 11:59 pm	119	#2 fan amps below hourly limit	119
12/7/2006	12:00 pm - 3:59 pm	239	#1 fan amps below hourly limit	239
12/18/2006	10:00 am - 2:59 pm	299	#2 fan amps below hourly limit due to preparation for alternative operating scenario stack test	299
12/18/2006	1:00 pm - 2:59 pm	119	#1 fan amps below hourly limit due to preparation for alternative operating scenario stack test	119
12/19/2006	8:03 am - 8:23 am	20	#1 fan down for damper adjustments	20

12/19/2006	10:00 am - 11:59 am	119	#1 fan amps below hourly limit	119
12/20/2006	7:34 am - 4:08 pm	514	#1 fan amps below hourly limit due to preparation for alternative operating scenario stack test	514

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 62. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 63
USEPA ALLEGATION:

From July 1, 2006, to December 31, 2006, U. S. Steel failed to comply with the Casthouse Baghouse #1 fan amp requirements of its written operation and maintenance plan for a period of 208 hours 20 minutes 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 208 hours and 20 minutes reported, U. S. Steel was casting 161 hours and 36 minutes, of which 29 hours and 49 minutes of the time for deviations while casting were attributable to malfunctions as reported to the Illinois EPA. U. S. Steel reported these time periods malfunctions to Illinois EPA as required:

Date	Time	Reported Duration (min)	Reason	Casting Duration (min)
7/20/2006	6:20 pm - 7/21/2006 3:25am	1090	both fans down due to electrical problems	1046
8/13/2006	4:10 pm - 4:20 pm	20	both fans down due to a blown fuse on the control for #2 fan	20
10/1/2006	2:00 pm - 2:50 pm	100	both fans down due to high vibration, bad fuse and dirty contractors	100
10/2/2006	5:29 am - 5:37 am	38	#2 fan down due to high inlet temperature	38
10/16/2006	7:30 am - 10/26/2006 2:06 pm	14796	#2 fan taken out for a rebuild	7757
10/25/2006	4:15 pm - 6:45 pm	150	#1 fan was taken down to realign the motor therefore no fans were operation at this time and only one fan was returned to service	150
11/10/2006	8:47 pm - 9:06 pm	38	both fans down	38
11/10/2006	9:06 pm - 9:27 pm	21	one fan down	21
11/10/2006	9:54 pm - 10:05 pm	18	both fans down	18
11/10/200	10:05 pm - 10:19	14	one fan down due to under voltage	14

6	pm			
11/10/2006	11:09 pm - 11:27 pm	36	both fans down	36
11/10/2006	11:27 pm - 11:35 pm	8	one fan down see next item	8
11/11/2006	12:08 am - 1:00 am	104	both fans down due to blown fuse and dirty air filters on the air compressors	104
11/13/2006	12:13 pm - 2:04 pm	222	both fans down due to loss of power due to phase short on incoming line to compressor	222
12/8/2006	10:13 am - 11:15 am	124	both fans down due to air pressure problem caused by frozen air filter	124

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 63. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 64
USEPA ALLEGATION:

From January 1, 2007, to June 30, 2007, U. S. Steel failed to comply with the Iron Spout Baghouse fan amp requirements of its written operation and maintenance plan for a period of 44 hours 40 C.F.R, §63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 44 hours, U. S. Steel was casting 41 hours and 38 minutes, of which 12 hours and 52 minutes of the time for deviations while casting were attributable to malfunctions as reported to the Illinois EPA. U. S. Steel reported these time periods of malfunctions to Illinois EPA as required:

Date	Time	Duration (min)	Reason	Casting Duration (min)
1/4/2007	10:00 pm - 10:59 pm	59	#1 and #2 fans fan amps below hourly limit	59
1/28/2007	2:00 am - 2:59 am	59	#1 and #2 fans fan amps below hourly limit	59
1/28/2007	5:00 am - 5:59 am	59	#1 and #2 fans fan amps below hourly limit	59
1/28/2007	7:00 am - 7:59 am	59	#1 and #2 fans fan amps below hourly limit	59
1/29/2007	12:00 am - 12:59 am	59	#1 and #2 fans fan amps below hourly limit	59
1/29/2007	1:00 am - 3:59 am	179	#2 fan fan amps below hourly limit	179
1/31/2007	7:00 pm - 11:59 pm	299	#1 fan fan amps below hourly limit	299
2/1/2007	12:00 am - 2:59 am	179	#1 fan fan amps below hourly limit	173

2/4/2007	2:00 am - 5:59 am	239	#1 and #2 fans fan amps below hourly limit	239
2/4/2007	11:00 am - 12:59 pm	119	#1 fan fan amps below hourly limit	119
2/4/2007	2:00 pm - 2:59 am	59	#1 and #2 fans fan amps below hourly limit	59
2/4/2007	10:00 pm - 11:59 pm	119	#1 fan fan amps below hourly limit	119
2/5/2007	10:00 am - 10:59 am	59	#1 fan fan amps below hourly limit	59
2/5/2007	11:00 am - 11:59 am	59	#1 and #2 fans fan amps below hourly limit	59
2/5/2007	12:00 pm - 1:59 pm	119	#1 fan fan amps below hourly limit	119
3/28/2007	1:00 am - 1:59 am	59	#1 and #2 fans fan amps below hourly limit	59
3/28/2007	3:00 am - 3:59 am	59	#2 fan fan amps below hourly limit	59
4/21/2007	3:00 pm - 3:59 pm	59	#1 and #2 fans fan amps below hourly limit	39
4/21/2007	5:00 pm - 5:59 pm	59	#1 and #2 fans fan amps below hourly limit	39
4/21/2007	6:00 pm - 8:59 pm	179	#1 fan fan amps below hourly limit	147
5/5/2007	4:00 am - 4:59 am	59	#1 and #2 fans fan amps below hourly limit	59
5/30/2007	6:00 am - 9:59 am	239	#1 and #2 fans fan amps below hourly limit	199
6/21/2007	1:00 pm - 2:59 pm	119	#1 and #2 fans fan amps below hourly limit	119
6/27/2007	2:00 pm - 2:59 pm	59	#1 and #2 fans fan amps below hourly limit	59

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 64/65. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 65
USEPA ALLEGATION:

From January 1, 2007, to June 30, 2007, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 42 hours and 5 minutes 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 42 hours and 5 minutes, 34 hours and 52 minutes of this time, U. S. Steel maintained operations with two dampers open which is consistent with the Blast Furnace O& M Revised Plan Revision 3, as noted in our response to Paragraph 61. U. S. Steel was casting 6 hours and 14 minutes out of the remaining 7 hours and 13 minutes reported. U. S. Steel reported these deviations to Illinois EPA as required.

Date	Time	Duration (min)	Reason	Casting Duration (min)
2/9/2007	3:13 pm - 3:52 pm	39	2 dampers open on A	0
2/9/2007	8:36 pm - 9:07 pm	31	2 dampers open on A	0
2/18/2007	7:38 am - 8:15 am	37	2 dampers open on A	0
2/20/2007	6;41 am - 7:21 am	40	2 dampers open on A	0
2/20/2007	12:29 pm - 1:02 pm	33	2 dampers open on A	0
2/21/2007	3:43 pm - 4:49 pm	66	2 dampers open on A	0
2/22/2007	2:56 am - 3:35 am	39	2 dampers open on A	0
2/23/2007	2:12 am - 2:59 am	47	2 dampers open on A	0
2/24/2007	12:40 am - 1:16 am	36	2 dampers open on A	0
2/24/2007	2:07 am - 2:48 am	41	2 dampers open on A	0
2/26/2007	2:48 am - 4:19 am	91	2 dampers open on A	0
2/27/2007	2:09 am - 2:46 am	37	2 dampers open on A	0
2/28/2007	12:01 am - 12:58 am	57	2 dampers open on A	0
3/3/2007	2;18 pm - 2:57 pm	39	2 dampers open on A	0
3/5/2007	7:44 pm - 8:14 pm	30	2 dampers open on A	0
3/7/2007	5:17 pm - 6:14 pm	57	2 dampers open on A	0
3/9/2007	5:24 pm - 6:01 pm	37	2 dampers open on A	0
3/11/2007	5:07 am - 5:46 am	39	2 dampers open on A	0
3/11/2007	10:28 am - 11:00 am	32	2 dampers open on A	0
3/16/2007	2:09 am - 2:50 am	41	2 dampers open on A	0
3/16/2007	2:52 am - 9:37 am	405	2 dampers open on A	0
3/18/2007	8:24 am - 9:02 am	36	2 dampers open on A	0
3/18/2007	3:57 p, - 4:28 pm	31	2 dampers open on A	0
3/21/2007	9:15 am - 10:09 am	54	2 dampers open on A	0
4/1/2007	5:04 am - 5:35 am	31	2 dampers open on A	0
4/7/2007	3:01 pm - 3:38 pm	37	2 dampers open on A	0
4/8/2007	5:40 pm - 6:27 pm	47	2 dampers open on A	0
4/13/2007	5:36 am - 6:19 am	44	2 dampers open on A	0
4/21/2007	1:48 am - 2:28 am	40	2 dampers open on A	0
4/22/2007	9:51 am - 10: 28 am	37	2 dampers open on A	0
4/25/2007	9:11 pm - 9;32 pm	22	2 dampers open on A	0
5/2/2007	2:39 pm - 3:54 pm	75	2 dampers open on A	0
5/4/2007	5:59 pm - 6:39 pm	40	2 dampers open on A	0

5/7/2007	6:57 pm - 7:38 pm	41	2 dampers open on A	0
5/16/2007	7:47 am - 8:18 am	31	2 dampers open on A	0
5/20/2007	11:01 am - 11:40 am	39	2 dampers open on A	0
5/21/2007	10:11 am - 10:14 am	3	3 dampers open on A	0
5/23/2007	2:55 am - 3:31 am	36	2 dampers open on A	0
5/30/2007	2:51 am - 3:21 am	30	2 dampers open on A	0
6/2/2007	5:34 am - 6:09 am	45	2 dampers open on A	0
6/3/2007	5:07 am - 5:46 am	99	2 dampers open on A	0

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 64/65. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 66
USEPA ALLEGATION:

From January 1, 2007, to June 30, 2007, U.S. Steel failed to comply with the Casthouse Baghouse fan amp requirements of its written operation and maintenance plan for a period of 387 hours 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 387 hours, U. S. Steel was casting 354 hours and 42 minutes, of which 342 hours and 53 minutes of the time for deviations while casting were attributable to malfunctions as reported to the Illinois EPA. U. S. Steel reported these time periods of malfunctions to Illinois EPA as required:

Date	Time	Duration (min)	Reason	Casting Duration (min)
1/4/2007	5:00am - 5:59 am	59	#1 and #2 fans fan amps below hourly limit	59
1/31/2007	12:00 pm - 9:59 pm	599	#1 and #2 fans fan amps below hourly limit	599
1/31/2007	10:00 pm - 11:59 pm	119	#2 fan fan amps below hourly limit	119
2/1/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1439
2/2/2007	12:00 am - 7:59 am	479	#2 fan fan amps below hourly limit	479
2/2/2007	8:00 am - 8:59 am	59	#1 and #2 fans fan amps below hourly limit	59
2/2/2007	9:00 am - 10:59 am	119	#1 fan fan amps below hourly limit	119
2/15/2007	1:00 pm - 11:59 pm	659	#1 fan fan amps below hourly limit	553

2/16/2007	12:00 am - 11:59 pm	1439	#1 fan fan amps below hourly limit	1443
2/17/2007	12:00 am - 11:59 pm	1439	#1 fan fan amps below hourly limit	1035
2/18/2007	12:00 am - 5:59 pm	359	#1 fan fan amps below hourly limit	310
3/9/2007	3:00 pm - 11:59 pm	539	#2 fan fan amps below hourly limit	507
3/10/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1378
3/11/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1239
3/12/2007	12:00 am - 3:59 pm	239	#2 fan fan amps below hourly limit	168
3/12/2007	5:00 pm - 5:59 pm	59	#1 and #2 fans fan amps below hourly limit	52
3/12/2007	9:00 pm - 11:59 pm	179	#2 fan fan amps below hourly limit	135
3/13/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1235
3/14/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1054
3/15/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1174
3/16/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1142
3/17/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1230
3/18/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1332
3/19/2007	12:00 am - 11:59 pm	1439	#2 fan fan amps below hourly limit	1321
3/20/2007	12:00 am - 7:59 pm	479	#2 fan fan amps below hourly limit	1367
3/27/2007	10:00 pm - 10:59 pm	59	#1 and #2 fans fan amps below hourly limit	20
3/27/2007	11:00 pm - 11:59 pm	59	#2 fan fan amps below hourly limit	34
3/30/2007	11:00 am - 11:59 pm	779	#1 and #2 fans fan amps below hourly limit	734
4/22/2007	11:00 am - 11:59 pm	779	#1 and #2 fans fan amps below hourly limit	682
4/24/2007	6:00 pm - 6:59 pm	59	#1 and #2 fans fan amps below hourly limit	59
5/7/2007	12:00 pm - 12:59 pm	59	#1 and #2 fans fan amps below hourly limit	0
5/26/2007	7:00 pm - 7:59 pm	59	#1 and #2 fans fan amps below hourly limit	48
6/11/2007	6:00 am - 8:59 am	179	#1 and #2 fans fan amps below hourly limit	157

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 66. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 67
USEPA ALLEGATION:

From July 1, 2007, to December 31, 2007, U.S. Steel failed to comply with the Iron Spout Baghouse #2 fan amp requirements of its written operation and maintenance plan for a period of 28 hours 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 28 hours reported, U. S. Steel was casting 25 hours and 28 minutes, of which 18 hours and 18 minutes of the time for deviations while casting were attributable to malfunctions as reported to the Illinois EPA. U. S. Steel reported these time periods of malfunctions to Illinois EPA as required.

Date	Time	Duration (min)	Reason	Casting Duration (min)
7/1/2007	7:00am - 8:00 am	60	#1 and #2 fans fan amps below hourly limit	37
7/4/2007	12:00 pm - 2:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
7/16/2007	11:00 am - 1:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
7/19/2007	4:00 pm - 5:00 pm	60	#1 and #2 fans fan amps below hourly limit	54
7/20/2007	1:00 pm - 2:00 pm	60	#1 and #2 fans fan amps below hourly limit	32
8/11/2007	2:00 pm - 5:00 pm	180	#1 and #2 fans fan amps below hourly limit	143
8/11/2007	7:00 pm - 8:00 pm	60	#1 and #2 fans fan amps below hourly limit	60
8/12/2007	4:00 pm - 6:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
8/13/2007	4:00 am - 5:00 am	60	#2 fan fan amps below hourly limit	37
8/14/2007	9:00 pm - 10:00 pm	60	#2 fan fan amps below hourly limit	60
8/15/2007	3:00 am - 5:00 am	120	#1 and #2 fans fan amps below hourly limit	120
9/21/2007	9:00 am - 11:00 am	120	#1 and #2 fans fan amps below hourly limit	120
10/24/2007	11:00 am - 1:00 pm	120	#1 and #2 fans fan amps below hourly limit	81
11/11/2007	2:00 pm - 7:00 pm	300	#2 fan fan amps below hourly limit	300
11/12/2007	5:00 pm - 6:00 pm	60	#1 and #2 fans fan amps below hourly limit	60

12/23/2007	10:00 am - 11:00 am	60	#1 and #2 fans fan amps below hourly limit	60

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 67. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 68
USEPA ALLEGATION:

From July 1, 2007, to December 31, 2007, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 63 hours and 34 minutes 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 69
USEPA ALLEGATION:

From July 1, 2007, to December 31, 2007, U.S. Steel failed to comply with the Casthouse Baghouse #1 fan amp requirements of its written operation and maintenance plan for a period of 16 hours 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 16 hours reported, U. S. Steel was casting 15 hours and 36 minutes. U. S. Steel reported all of these periods of deviations as malfunctions to the Illinois EPA.

Date	Time	Duration (min)	Reason	Casting Duration (min)
8/2/2007	11:00 am - 6:00 pm	420	#1 fan fan amps below hourly limit	398
10/17/2007	4:00 pm - 5:00 pm	60	#1 fan fan amps below hourly limit	60
10/21/2007	5:00 am - 6:00 am	60	#1 fan fan amps below hourly limit	60
12/9/2007	12:00 am - 7:00 am	420	#1 fan fan amps below hourly limit	418

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 69/70. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 70
USEPA ALLEGATION:

From July 1, 2007, to December 31, 2007, U.S. Steel failed to comply with the Casthouse Baghouse #2 fan amp requirements of its written operation and maintenance plan for a period of 32 hours 40 C.F.R. §63.7834(a)(l),

U. S. STEEL RESPONSE:

Of the referenced 32 hours reported, U. S. Steel was casting 30 hours and 45 minutes. U. S. Steel reported all of these periods of deviations as malfunctions to the Illinois EPA.

Date	Time	Duration (min)	Reason	Casting Duration (min)
8/2/2007	11:00 am - 12:00 pm on 8/3/2007	1500	#2 fan fan amps below hourly limit	1425
10/17/2007	4:00 pm - 5:00 pm	60	#2 fan fan amps below hourly limit	60
10/21/2007	5:00 am - 6:00 am	60	#2 fan fan amps below hourly limit	60
12/9/2007	12:00 am - 4:00 am	240	#2 fan fan amps below hourly limit	240
12/9/2007	5:00 am - 6:00 am	60	#2 fan fan amps below hourly limit	60

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 69/70. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 71
USEPA ALLEGATION:

From January 1, 2008, to June 30, 2008, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp requirements of its written operation and maintenance plan for a period of 66 hours 40 C.F.R, § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 66 hours reported, U. S. Steel was casting 57 hours and 59 minutes, of which 55 hours and 59 minutes were attributable to malfunctions and reported to Illinois EPA accordingly.

Date	Time	Duration (min)	Reason	Casting Duration (min)
1/1/2008	9:00 am - 2:00 pm	300	#1 fan fan amps below hourly limit	278
1/1/2008	3:00 pm - 8:00 pm	300	#1 fan fan amps below hourly limit	271
1/1/2008	3:00 pm - 4:00 pm	60	#2 fan fan amps below hourly limit	60
1/2/2008	12:00 am - 1:00	60	#1 fan fan amps below hourly limit	60

	am			
1/2/2008	6:00 am - 7:00 am	60	#1 fan fan amps below hourly limit	60
1/2/2008	6:00 am - 7:00 am	60	#2 fan fan amps below hourly limit	60
1/30/2008	9:00 am - 10:00 am	120	#1 and #2 fans fan amps below hourly limit	120
3/2/2008	10:00 am - 12:00 pm	240	#1 and #2 fans fan amps below hourly limit	208
3/12/2008	9:00 am - 10:00 am	120	#1 and #2 fans fan amps below hourly limit	0
3/25/2008	1:00 pm - 2:00 pm	60	#2 fan fan amps below hourly limit	55
3/27/2008	9:00 pm - 10:00 pm	60	#1 fan fan amps below hourly limit	54
4/15/2008	7:00 am - 8:00 am	120	#1 and #2 fans fan amps below hourly limit	48
4/15/2008	10:00 am - 3:00 pm	600	#1 and #2 fans fan amps below hourly limit	514
5/5/2008	4:00 pm - 5:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
5/10/2008	7:00 pm - 8:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
5/20/2008	1:00 pm - 2:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
6/5/2008	6:00 am - 12:00 pm	360	#2 fan fan amps below hourly limit	321
6/9/2008	8:00 pm - 2:00 am 6/10/208	720	#1 and #2 fans fan amps below hourly limit	682
6/19/2008	8:00 am - 10:00 am	240	#1 and #2 fans fan amps below hourly limit	228
6/30/2008	1:00 pm - 2:00 pm	120	#1 and #2 fans fan amps below hourly limit	100

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 71. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 72
USEPA ALLEGATION:

From January 1, 2008, to June 30, 2008, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 67 hours and 45 minutes 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 73
USEPA ALLEGATION:

From January 1, 2008, to June 30, 2008, U.S. Steel failed to comply with the Casthouse Baghouse fan amp requirements of its written operation and maintenance plan for a period of 56 hours 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 56 hours reported, U. S. Steel was casting 49 hours and 24 minutes, of which 34 hours and 1 minute were attributable to malfunctions and reported to Illinois EPA accordingly.

Date	Time	Duration (min)	Reason	Casting Duration (min)
1/20/2008	10:00 am - 11:00 am	120	#1 and #2 fans fan amps below hourly limit	112
1/23/2008	11:00 am - 2:00 pm	180	#1 fan fan amps below hourly limit	141
1/23/2008	12:00 pm - 2:00 pm	120	#2 fan fan amps below hourly limit	121
1/24/2008	7:00 am - 9:00 am	240	#1 and #2 fans fan amps below hourly limit	240
1/24/2008	1:00 pm - 2:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
1/25/2008	9:00 am - 12:00 pm	180	#1 fan fan amps below hourly limit	180
1/25/2008	9:00 am - 1:00 pm	240	#2 fan fan amps below hourly limit	240
1/31/2008	1:00 pm - 3:00 pm	240	#1 and #2 fans fan amps below hourly limit	184
2/20/2008	9:00 am - 10:00 am	120	#1 and #2 fans fan amps below hourly limit	120
3/1/2008	10:00 am - 2:00 pm	480	#1 and #2 fans fan amps below hourly limit	374
3/9/2008	10:00 am - 11:00 am	120	#1 and #2 fans fan amps below hourly limit	120
3/12/2008	5:00 pm - 6:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
3/17/2008	8:00 am - 9:00 am	120	#1 and #2 fans fan amps below hourly limit	120
3/17/2008	11:00 pm - 1:00 am on 3/18/2007	240	#1 and #2 fans fan amps below hourly limit	222
3/21/2008	1:00 pm - 2:00 pm	120	#1 and #2 fans fan amps below hourly limit	120
4/24/2008	2:00 pm - 4:00 pm	240	#1 and #2 fans fan amps below hourly limit	176
6/26/2008	2:00 pm - 5:00 pm	360	#1 and #2 fans fan amps below hourly limit	254

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 73. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 74
USEPA ALLEGATION:
From July 1, 2008, to December 31, 2008, U.S. Steel failed to comply with the Iron Spout Baghouse fan amp requirements of its written operation and maintenance plan for a period of 31 hours 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 31 hours reported, U. S. Steel was casting 26 hours and 42 minutes, of which 19 hours and 44 minutes were attributable to malfunctions and reported to Illinois EPA accordingly

Date	Time	Duration (min)	Reason	Casting Duration (min)
7/3/2008	7:00 am - 10:59 am	239	#2 fan fan amps below hourly limit	239
7/15/2008	11:00 am - 11:59 am	59	#1 fan fan amps below hourly limit	24
8/2/2008	10:00 pm - 7:59 am on 8/3/2008	1198	#1 and #2 fans fan amps below hourly limit	1058
8/4/2008	12:00 pm - 12:59 pm	118	#1 and #2 fans fan amps below hourly limit	102
9/9/2008	7:00 am - 10:59 am	239	#2 fan fan amps below hourly limit	179

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 74. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 75
USEPA ALLEGATION:

From July 1, 2008, to December 31, 2008, U.S. Steel failed to position the Iron Spout Baghouse dampers consistent with its written operation and maintenance plan for a period of 1 hour and 48 minutes 40 C.F.R. § 63.7834(a)(l).

U. S. STEEL RESPONSE:

U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 76
USEPA ALLEGATION:

From July 1, 2008, to December 31, 2008, U.S. Steel failed to comply with the Casthouse Baghouse fan amp requirements of its written operation and maintenance plan for a period of 19 hours 40 C.F.R, § 63.7834(a)(l).

U. S. STEEL RESPONSE:

Of the referenced 19 hours reported, U. S. Steel was casting 14 hours and 56 minutes, of which all deviations were attributable to malfunctions and reported to Illinois EPA accordingly.

Date	Time	Duration (min)	Reason	Casting Duration (min)
9/14/2008	8:00 pm - 12:59 am on 9/15/2008	299	#1 fan fan amps below hourly limit	281
9/14/2008	8:00 pm - 1:59 am on 9/15/2008	359	#2 fan fan amps below hourly limit	231
10/1/2008	5:00 pm - 6:59 pm	258	#1 and #2 fans fan amps below hourly limit	258
11/19/2008	8:00 am - 8:59 am	118	#1 and #2 fans fan amps below hourly limit	56
11/21/2008	5:00 am - 5:59 am	118	#1 and #2 fans fan amps below hourly limit	70

Excerpts of reports regarding the deviations that were attributable to malfunctions, as previously provided to the Illinois EPA, are provided behind Tab 76. By way of further response, U. S. Steel refers U. S. EPA to its response to the U. S. EPA allegations raised in Paragraph No. 61 regarding corrective actions, as provided above.

PARAGRAPH NO. 77
USEPA ALLEGATION:

On February 1, 2008, U.S. Steel self-reported in its 40 C.F.R. Part 63, Subpart L Report to EPA coke oven door emissions of 4.4 percent on a 30-day rolling average from Coke Oven Battery A in violation of 40 C.F.R. Part 63, Subpart L.

U. S. STEEL RESPONSE:

As discussed during our meeting, the above-referenced February 1, 2008 report erroneously reported excessive door emissions from Battery A. After submittal of the February 1, 2008 report, U. S. Steel's Method 303 contractor, OCS Environmental, Inc., has reported that a spreadsheet error resulted in the erroneous report. OCS Environmental has explained that the mistake was inadvertently caused by a cell copying error. The correct 30-day rolling average is 3.03% which meets the applicable standards established by 40 CFR § 63 Subpart L. Please refer to the OCS Environmental letter to U. S. Steel, dated October 7, 2009, provided behind Tab 77. U. S. Steel and OCS Environmental now have additional reviews to verify the reports prior to their submittal to prevent the reoccurrence of issuing reports with such errors.

While U. S. Steel respectfully disagrees with many of U. S. EPA's allegations, we appreciate the opportunity to respond to the NOV/FOV and we look forward to resolving any outstanding issues expeditiously. We appreciate your continued attention and cooperation. Should you have any questions regarding this correspondence, please contact me.

Sincerely,

David W. Hacker

Attachments

cc: Brian Dickens, PE (EPA) – via email and express mail
Chris Pressnall, Esq. (IEPA)
Richard Veitch (USS)
Jill Foust (USS)
Robert Ribbing (USS)
David Smiga, Esq. (USS)
Tishie Woodwell (USS)
Mark Jeffrey (USS)